



Susan M. Sharko
973-549-7350 Direct
973-360-9831 Fax
susan.sharko@dbr.com

Law Offices

600 Campus Drive
Florham Park, NJ
07932-1047

973-549-7000 phone
973-360-9831 fax
www.drinkerbiddle.com

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November 30, 2016

VIA ECF

Honorable Freda L. Wolfson, U.S.D.J.
United States District Court
Clarkson S. Fisher Building & US Courthouse
402 East State Street
Trenton, NJ 08608

**Re: *In re: Johnson & Johnson Talcum Powder Products Marketing, Sales
Practices and Products Liability Litigation*
MDL No. 2738**

Dear Judge Wolfson:

I write on behalf of all the defendants. We met and conferred with Ms. Parfitt and Ms. O'Dell and unfortunately were not able to reach agreement on the form and substance of the first CMO. The disputed sections are highlighted in yellow on the attached, with each side's alternative language. Thank you for your consideration of this matter.

Respectfully,

DRINKER BIDDLE & REATH LLP

/s/ Susan M. Sharko

Susan M. Sharko

cc: Counsel of Record (via ECF)

Andrew B. Joseph
Partner responsible for
Florham Park Office